

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

KATHY BARTH,)	
)	
Complainant,)	
)	
vs.)	No.
)	
CENTRAL ILLINOIS PUBLIC SERVICE CO.,))	
d/b/a AmerenCIPS,)	Complaint ID: 2005-07323S
)	
Respondent.)	

COMPLAINT

Now comes the complainant, KATHY BARTH (hereafter "Ms. Barth"), by her attorney Paul Matalonis of Land Of Lincoln Legal Assistance Foundation, Inc., and files this formal complaint against AmerenCIPS stating the following:

1. Ms. Barth currently resides at 2571 South Illinois Ave. Lot 33, Carbondale, Illinois.
2. AmerenCIPS's address is P.O. Box 66875, St. Louis, MO 63166.
3. This complaint concerns Ms. Barth's residential gas and electrical service provided by AmerenCIPS at her address above on her account 49690-07327.
4. Ms. Barth has had an account with AmerenCIPS for years and she has substantially complied with her obligations with this account.
5. Back in August 2004, when her account was not past due, she received a termination notice out of the blue threatening termination of service a few days later.
6. On or about August 4, 2004, she called the AmerenCIPS customer service number and was told that her account had been "red flagged" and no information could be provided until

she faxed her picture id and Social Security card. She explained that she did not have a Social Security card and did not have immediate access to a fax machine. AmerenCIPS told her to mail it or fax as soon as possible. She made several more demands and calls for information about what was going on, but she was told each and every time only that "your account has been red-flagged." She was not given any details so that she could understand the dispute.

7. Before Ms. Barth was going to provide this private identification information, she had a right to notice of the reason it was being requested, the nature of the claim against her or her account, the reason the requested information would resolve the claim, and a hearing to determine if this request for information was justified. By not providing Ms. Barth with notice of this information and a hearing concerning it, AmerenCIPS had no right to terminate her service since she was current on her account.

8. On August 26, 2004, her service was terminated despite not being past due and despite not receiving any specific information to challenge the basis for the termination or an opportunity for a hearing.

9. She faxed the same information again and again and 4 days later her service was reconnected.

10. During the time Ms. Barth's service was off, she lost about \$1000 in groceries (she had recently paid for groceries, had a full refrigerator, and had a great deal of frozen meats), paid a \$75 hotel bill, spent time, energy, and money attempting to resolve this problem, and she was emotionally distressed and humiliated.

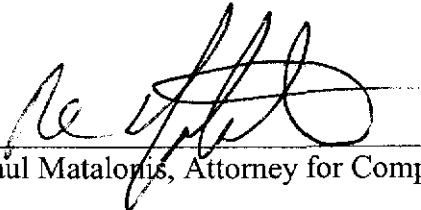
11. Ms. Barth has been damaged by AmerenCIPS in the amount of \$2575.00.

12. Ms. Barth agrees to accept service via email by her attorney at

pmatalonis@lollaf.org.

WHEREFORE, Ms. Barth requests an order in her favor requiring AmerenCIPS to pay her \$2575.00.

Respectfully submitted,



Paul Matalonis, Attorney for Complainant


Kathy Barth, Complainant

STATE OF ILLINOIS)
)
County of Jackson)

I, Sandi Gordon, a Notary Public in and for said County and State, do hereby certify that KATHY BARTH, personally known to me to be the same person whose name is subscribed to the foregoing waiver of summons, appeared before me this day in person, and acknowledged that he signed said appearance as his free and voluntary act, for the purpose therein set forth.

Given under my hand and Notarial Seal, April 13, 2006.


NOTARY PUBLIC

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